

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MATTHEW POWER,

Plaintiff,

v.

CONNECTWEB TECHNOLOGIES, INC.,
MICHAEL BEAULIEU, PAUL BEAULIEU,
RUBBER STAMP CHAMP, INC., ANCHOR
RUBBER STAMP & PRINTING CO., INC.,
THE J.P. COOKE COMPANY, and
GOOGLE, LLC,

Defendants.

Civil Action No. 1:22-cv-10030-JGD

DECLARATION OF MICHAEL ROOZEN

I, Michael Roozen, declare as follows:

1. My name is Michael Roozen. I reside in California. I am the owner of the business called Rubber Stamp & Button Champ. This business (incorrectly named in the Amended Complaint as “Rubber Stamp Champ, Inc.”) operates as a sole proprietorship known as “Michael J. Roozen, doing business as Rubber Stamp & Button Champ” (hereinafter “Rubber Stamp”).
2. I make this Declaration upon personal knowledge of the facts set forth herein.
3. Rubber Stamp’s principal place of business and headquarters is in San Marcos, California
4. Rubber Stamp sells its products across the United States, but it has no physical presence in Massachusetts.

5. While Rubber Stamps sells its products in all 50 states, its annual sales to Massachusetts residents are on par with its sales to customers in states with similar population sizes.

6. Rubber Stamp has never entered into an agreement with Plaintiff.

7. Rubber Stamp does not maintain a registered agent for service of process in Massachusetts.

8. Rubber Stamp is not registered with the Secretary of the Commonwealth of Massachusetts.

9. Rubber Stamp does not have any offices in Massachusetts.

10. Rubber Stamp does not have any telephone listings or mailing addresses in Massachusetts.

11. Rubber Stamp does not own assets or bank accounts in Massachusetts.

12. Rubber Stamp does not own or lease any property located in Massachusetts.

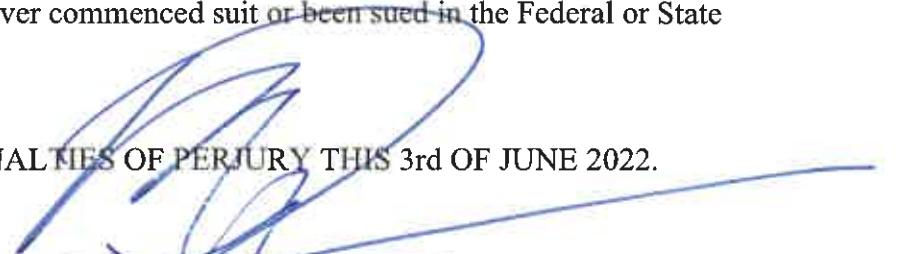
13. Rubber Stamp is not subject to property taxation by Massachusetts.

14. Rubber Stamp does not have any employees or agents based in Massachusetts.

15. Rubber Stamp does not purchase advertising within Massachusetts.

16. Rubber Stamp has never commenced suit ~~or been sued in~~ the Federal or State Courts within Massachusetts.

SIGNED UNDER THE PENALTIES OF PERJURY THIS 3rd OF JUNE 2022.



Michael Koozen

CERTIFICATE OF SERVICE

I hereby certify that this document has been filed through the CM/ECF system on June 7, 2022, and will be served electronically to the registered participants as identified on the Notice of Electronic Filing through the Court's transmission facilities, and that non-registered participants have been served this day by mail.

/s/ Stephen D. Riden